

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

No. 3:16-CR-284-N

JOSE FLORES (03)

FACTUAL RESUME

INDICTMENT:

Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).

PLEA:

Guilty plea to Count One.

MAXIMUM PENALTY:

The maximum penalty that can be imposed is as follows:

\$1,000,000 fine and not more than twenty (20) years imprisonment, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

In order to establish each of the offenses alleged in Count One of the Indictment, the Government must prove the following elements beyond a reasonable doubt:

First: That the defendant and another person, directly or indirectly, reached an agreement to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

Second: That the defendant knew the unlawful purpose of the agreement;

Third: That the defendant joined the agreement willfully, that is, with the intent to further its unlawful purpose.

STIPULATED FACTS:

Beginning in or around August 2014, and continuing until on or about July 26, 2015, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant Jose Flores, along with Marcos Batz, Heliodoro Catalan and Norberto Catalan Martinez, did knowingly and intentionally conspire with each other, and others, to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846.

In 2014 and 2015, Jose Flores introduced a Confidential Informant to drug dealers in order to facilitate the Confidential Informant's purchase a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. Specifically, the defendant introduced a Confidential Informant to Heliodoro Catalan, to assist in multiple methamphetamine transactions.

SIGNED and AGREED to on this the 19th day of July, 2016.

Flores Jose
JOSE FLORES
Defendant

Phil Umphres
PHIL UMPHRES
Attorney for Defendant